

1 IN THE U.S. BANKRUPTCY COURT
2

3 NORTHERN DISTRICT OF OHIO
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5
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7 In Re: Grant Thomas Wilcox
8

9 Grant T. Wilcox,
10 9858 Green Dr
11 Windham, OH 44288

12 Debtor
13

Bankruptcy Case: 20-51998-amk

Honorable Alan M. Koschik

14 DEBTORS 2ND RESPONSE TO
15 CREDITORS OBJECTION

16 Now comes the Debtor, pro se, and respectfully requests that this
17 Court deny Creditor Sara Butts objection again. First off the Creditor is
18 once again contorting the fact to meet their own personal agenda to stop
19 the bankruptcy. Once the Creditor was offered to opportunity to speak to
20 Ms. Carnahan however the Creditor declined. Ms. Carnahan signed the
21 affidavit and is admissible contrary to assertions of the Creditors. Ms.
22 Carnahan intends to be available for the Confirmation Hearing to testify
23 if need be. Second of all in the Debtors motion for the return of the
24 vehicle with an unrelated case the Debtor was referring to the fact that the
25
26
27
28

DEBTORS RESPONSE TO CREDITORS OBJECTION - 1

1 2016 Ford Fusion hasn't been seen since July 5th, 2020. Of course the
2 Creditor is attempting to distort the facts in order to fit their narrative.
3

4 Furthermore in that same case that the Creditors referenced, Ms.
5
6 Carnahan address is listed 9858 Green Dr. Attached as Exhibit A is a
7 January 8th, 2021 entry showing Ms. Carnahan's address 9858 Green Dr,
8 Windham, OH 44288 on page 2 and 3. Which is a public record and is
9 admissible as evidence.
10

11 As for the allegation that the Debtor mis represented to the trustee
12 about the Ford Fusion. The Debtor DID disclose and stated that the
13 Police had it however it was yet to be returned to the Debtor. This
14 information and situation was also disclosed to the Debtor's previous
15 counsel. Which to this day the Ford Fusion has NOT been returned to the
16 Debtor. Debtor assumes this vehicle is lost because the Prosecutors
17 office hasn't released any information regarding the status of the car.
18
19 Again another example the Creditor is attempting to twist the facts.
20

23
24 Respectfully Submitted,

25 /s/ Grant T. Wilcox
26 Grant T. Wilcox
27 Debtor, Pro Se
28 9858 Green Drive
 Windham, OH 44288
 330-990-5416
 grant.wilcox@gmail.com

1
2 **CERTIFICATE OF SERVICE**
3

4 I hereby certify that on February 19th, 2021, the following entities
5 were served a copy of this brief.
6

7 **Electronic Mail**
8

9 US Trustee ustpregion09.cl.ecf@usdoj.gov
10

11 Keith Rucinski krucinski@ch13akron.com
12

13 Tony DeGirolamo tony@ajdlaw7-11.com
14

STATE OF OHIO
PORTAGE COUNTYSTATE OF OHIO
PLAINTIFF

vs.

Jamie Carnahan
PROBATIONER

| | |
|--|--------------------------------|
| FILED PORTAGE COUNTY MUNICIPAL COURT | IN THE PORTAGE MUNICIPAL COURT |
| CASE NUMBER: 2020CRB01324R | |
| JAN 08 2021 : JUDGE MARK FANKHAUSER | |
| JILL FANKHAUSER, Clerk REQUEST TO MODIFY/REVOKE PROBATION RAVENNA, OH | |

The Adult Probation Department respectfully requests that the above individual's probation, which is due to terminate on: 04/23/2021, be modified/revoked, based on the following conditions:

- Probationer failed to report to a mandatory reporting appointment at the Adult Probation Department on 12/04/2020 at 2:30 PM, and 12/29/2020 at 9:30 AM.

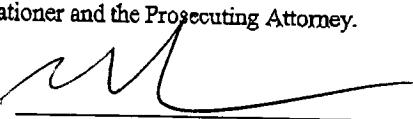
Dalton Todd
Probation Officer

(Designee) Chief Probation Officer

1-7-21

ORDER

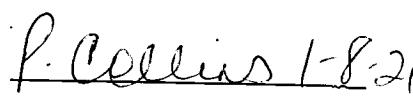
The Court, having reviewed the request of the Chief Probation Officer to extend/revoke probation, hereby grants such request and orders that such be set for hearing, with notice to the Probationer and the Prosecuting Attorney.



Judge

HEARING DATE

The above captioned Probationer will hereby take notice that this matter will be heard on: Fri.
 the 16th day of April, 2021 at 10:00 a.m. in the Courtroom of Judge Fankhauser at the Portage County Municipal Court, 203 West Main Street, Ravenna, Ohio 44266.



Assignment Commissioner Date

PROOF OF SERVICE

This is to certify that a copy of the foregoing Request/Order has been sent to the Probationer, as there is no Attorney of Record for the Probationer, and to the office of the Portage County Prosecutor, on the _____ day of _____, 2020.

(Designee) Chief Probation Officer

IN THE MUNICIPAL COURT
PORTAGE COUNTY, OHIO

STATE OF OHIO

CASE NUMBER: 2020CRB01324R

-VS-

INSTRUCTIONS TO CLERK

JAMIE CARNAHAN
PROBATIONER

YOU ARE HEREBY INSTRUCTED TO ISSUE A SUMMONS AND A MOTION TO
REVOKE/MODIFY PROBATION TO THE ABOVE NAMED DEFENDANT AT THE BELOW
STATED ADDRESS. SERVICE IS REQUESTED BY THE FOLLOWING METHOD:

REGULAR AND CERTIFIED MAIL
 PERSONAL SERVICE
 OTHER _____

A HEARING ON THE MOTION TO REVOKE/MODIFY PROBATION HAS BEEN
SCHEDULED FOR Friday, Apr 16, 2021 @ 10:00am.

PROBATIONER'S ADDRESS
9858 Green Dr.
WINDHAM, OH 44288



Judge

IN MUNICIPAL COURT
PORTAGE COUNTY, OHIO

STATE OF OHIO

SUMMONS

-VS-

CASE NUMBER: 2020CRB01324R

JAMIE CARNAHAN
PROBATIONER

A MOTION TO REVOKE/MODIFY PROBATION, A COPY OF WHICH IS ATTACHED
HERETO HAS BEEN FILED IN THE COURT, CHARGING YOU WITH THE OFFENSE
OF:

PROBATION VIOLATION

YOU ARE SUMMONED AND ORDERED TO APPEAR IN THE PORTAGE COUNTY
MUNICIPAL COURT, RAVENNA, OHIO, ON FriDay, Apr. 16, 2021 @ 10:00 a.m.

IF YOU FAIL TO APPEAR AT THE TIME AND PLACE STATED ABOVE, YOU MIGHT
BE ARRESTED.

ISSUED: 1/8/21

JILL FANKHAUSER, CLERK OF COURTS

BY Yaelizae Vli
DEPUTY

PROBATIONER'S ADDRESS
9858 GREEN DR
WINDHAM OH 44288

THE PORTAGE COUNTY MUNICIPAL COURT-
RAVENNA BRANCH, IS LOCATED AT 203 WEST
MAIN STREET, RAVENNA, OHIO 44266
THE KENT BRANCH, IS LOCATED AT 303 EAST
MAIN STREET, KENT, OHIO 44240